

Marquis Aurbach

Craig R. Anderson, Esq.

Nevada Bar No. 6882

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

canderson@maclaw.com

Attorneys for Defendants LVMPD, Kerry Kubla, Brice Clements, Alex Gonzales, Russell Backman, James Rothenburg, James Bertuccini and Melanie O'Daniel

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LATIA ALEXANDER, individually as heir
of ISIAIAH T. WILLIAMS, and in her
capacity as Special Administrator of the
Estate of ISIAIAH T. WILLIAMS,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of
the State of Nevada; KERRY KUBLA, in his
individual capacity; BRICE CLEMENTS, in
his individual capacity; ALEX GONZALES,
in his individual capacity; RUSSELL
BACKMAN, in his individual capacity;
JAMES ROTHENBURG, in his individual
capacity; JAMES BERTUCCINI, in his
individual capacity; MELANIE O'DANIEL,
in her individual capacity and DOES I-XX,
inclusive,

Defendants.

Case Number:
2:24-cv-00074-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE (SECOND REQUEST)**

MARQUIS AURBACH

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Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

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1 Defendants Las Vegas Metropolitan Police Department (“LVMPD”), Kerry Kubla,
2 Brice Clements, Alex Gonzales, Russell Backman, James Rothenburg, James Bertuccini and
3 Melanie O’Daniel (“LVMPD Defendants”), by and through their counsel, Marquis Aurbach,
4 and Plaintiff Latia Alexander, individually as heir of Isaiah T. Williams, and in her capacity
5 as Special Administrator of the Estate of Isaiah T. Williams (“Plaintiff”), by and through her
6 counsel of record, Breeden & Associates, PLLC, hereby agree and jointly stipulate the
7 following:

8 1. The deadline for filing dispositive motions is **April 11, 2025**. (ECF No. 40.)

9 2. The parties are waiting for the deposition transcript of LVMPD’s Rule
10 30(b)(6) witnesses that is critical to the parties’ claims and defenses.

11 3. Defense counsel is out of the office April 8 and 9, 2025 for oral argument at
12 the Ninth Circuit Court of Appeals in the case of *Browning v. Las Vegas Metro Police*
13 *Dep’t.*, Case No. 24-2034.

14 4. Therefore, the parties request a 21-day extension to file dispositive motions
15 until **May 2, 2025**.

16 5. This request for an extension of time is not sought for an improper purpose or
17 other purpose of delay. The parties are requesting a 21-day extension because they agree the
18 outstanding deposition transcript is important for summary judgment purposes and defense
19 counsel will not have adequate time to incorporate it into defendants’ dispositive motion due
20 to the scheduled oral argument.

21 6. WHEREFORE, the parties respectfully request the dispositive motion
22 deadline be extended to and including **May 2, 2025**.

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7. This Stipulation is being entered in good faith and not for purposes of delay.

IT IS SO STIPULATED this 3rd day of April, 2025.

MARQUIS AURBACH

BREEDEN & ASSOCIATES, PLLC

By: s/Craig R. Anderson
Craig R. Anderson, Esq.
Nevada Bar No. 6882
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney for Defendants

By: /s/ Adam Breeden
Adam Breeden, Esq.
Nevada Bar No. 8768
7432 W. Sahara Ave, Ste 101
Las Vegas, Nevada 89117
Attorney for Plaintiff

MURPHY'S LAW

By: s/Corrine P. Murphy
Corrine P. Murphy, Esq.
Nevada Bar No. 10410
2620 Regatta Dr., Ste. 102
Las Vegas, Nevada 89128
Attorney for Plaintiff

ORDER

The above Stipulation is hereby GRANTED

IT IS SO ORDERED.

Dated: April 4, 2025


UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH

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